

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT WESTERN INSURANCE COMPANY

Plaintiff,

vs.

MARK GRAHAM, DONALD SOLOW, BLUE
CAPITAL MANAGEMENT, INC., BLUE
ALTERNATIVE ASSET MANAGEMENT LLC,
WILMINGTON SAVINGS FUND SOCIETY, FSB,
CHRISTIANA TRUST, REGATTA HOLDINGS
LLC, CYGNET 001 MASTER TRUST, CYGNET
001 MASTER TRUST SERIES 2011-A, CYGNET
001 MASTER TRUST SERIES 2011-C, CYGNET
001 MASTER TRUST SERIES 2013-A, ALPH RE
LIMITED, ALPHA RE HOLDINGS (CAYMAN)
LIMITED, ATLANTIC SPECIALTY FINANCE,
BLUE ELITE FUND LTD., BLUE ELITE FUND
LP, BLUE II LTD., SANCUS CAPITAL BLUE
CREDIT OPPORTUNITIES FUND LTD.,
ABILITY INSURANCE COMPANY, JOHN
DRAKE, EDWARD BRENDAN LYNCH, AND
GREGORY TOLARAM.

Defendants.

Case No. 18-cv-06249 (VSB)

RULE 7.1 DISCLOSURE
STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for defendant Sancus Capital Blue Credit Opportunities Fund, Ltd. (“Sancus Blue”), a private non-governmental party, certifies that there is no parent corporation of Sancus Blue and no publicly held corporation owning 10% or more of its stock.

Dated: New York, New York
August 20, 2018

SEWARD & KISSEL LLP

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Fund, Ltd.*